

III. REMARKS

Claims 1-20 are pending in this application. By this amendment, claims 1, 10 and 19 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. §1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 19-20 are rejected under 35 U.S.C. 101 as allegedly being directed to non-statutory subject matter. The Office argues that the computer readable storage medium of claim 19 could include a data carrier. Applicants have amended claim 19 to recite, *inter alia*, a tangible computer readable storage medium. Applicants submit that the claimed invention is directed to statutory subject matter. Accordingly, Applicants request that the rejection be withdrawn.

In the Office Action, claims 1, 10 and 19 are rejected under 35 U.S.C. 112, second paragraph for allegedly being indefinite. The Office argues that it the limitation that the application is not intercepted at run-time is contradictory with the fact that the system is a 'run-time' system. Applications respectfully disagree. However, in the interests of expediting an allowance of these claims, Applicants have amended claims 1, 10 and 19 to better explain that in

the claimed system, the application's natural run-time execution is protected. In light of this clarifying amendment, Applicant's request that this rejection be withdrawn.

In the Office Action, claims 1, 10 and 19 are rejected under 35 U.S.C. 112, first paragraph for allegedly failing to comply with the written description requirement. As discussed above, Applicants have amended claims 1, 10 and 19 to clarify the invention. As such, Applicants request that this rejection be withdrawn.

In the Office Action, claims 1-6, 8-15 and 17-20 are rejected under 35 U.S.C. 102(b) as allegedly being anticipated by Halviatti et al. (U.S. Pat. No. 5,475,843), hereinafter "Halviatti." Reconsideration in view of the following remarks is respectfully requested.

With respect to claims 1, 10 and 19, Applicants submit that Halviatti fails to disclose each and every element of the claims, including script translation means for intercepting a call from the automation script to a function simulating a user action on the application while protecting the application's natural run-time execution. (See claim 1, and as similarly recited by claims 10 and 19). Interpreting Halviatti only for purposes of this response, Applicants submit that Halviatti relies on the specific interception of the running application to achieve its goals, therefore not protecting the application's natural run-time execution, including the need to write ATUs (Application Translation Units), which are not necessary in the claimed invention. See *e.g.*:

...the target application is registered with the Message Engine 350. In particular, hooks are installed by a corresponding ATU 340 so that events within the target application of interest are trapped.

Halviatti, Col. 10, lines 43-47. Halviatti further teaches that each event is trapped for processing by an ATU. Col. 10, lines 55-57. This level of interception is intrusive and compromises the

execution of the application at run-time. While the claimed invention protects the application's run-time execution, Halviatti specifically relies on interference during run-time.

Furthermore, with respect to claims 2, 11 and 20, Applicants submit that Halviatti fails to disclose, *inter alia*, selective text locator means coupled to the message translation means for selectively supplying appropriately translated text to the automation script's run time execution depending on the function call in a case that a same text string is translated differently based on context. In the present invention, the selective text locator ensures that during a search the correct translation is returned based on the type of control the textual object belongs to. The general translation call in Halviatti however, fails to disclose this claimed feature because a general call to translate a message in a Windows environment is not equivalent to selecting an accurate text translation from a plurality of available translations. Accordingly, Applicants submit that Halviatti fails to disclose each and every element of the claimed invention and respectfully request withdrawal of the rejection.

With respect to all other dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Each dependent claim is believed to be allowable based on the above arguments, as well as for their own additional features.

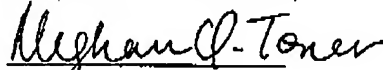
In the Office Action, claims 7 and 16 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Halviatti, in view of Laane (U.S. Pat. No. 6,978,445). Applicants herein incorporate the arguments presented above with respect to the independent claim from which the claims depend. Claims 7 and 16 are believed to be allowable based on the above arguments, as well as for their own features.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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